EXHIBIT E

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

JASON WILLIAMS,

Plaintiff,

CERTIFIED COPY

vs.

Case No. 5:19-cv-00475-BO

AT&T MOBILITY, LLC,

Defendant.

CONFIDENTIAL
DEPOSITION OF RAY HILL
30(b)(6)

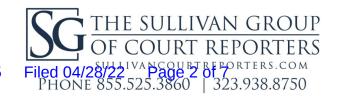
November 17, 2021

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9:02 a.m. - 6:48 p.m. EST

REMOTELY REPORTED VIA VIDEO CONFERENCING

REPORTED BY: Tamara L. Houston CA CSR No. 7244, RPR, CCRR No. 140 FILE NO. 21-105383



	1	Q. Who else was present during that
	2	conversation
	3	A. No one.
	4	Q other than you, Ms. Okcu, and
09:32:20	5	Mr. Breslin?
	6	A. No one.
	7	Q. Did you review any documents in preparation
	8	for today's deposition?
	9	A. There was a printout of the account notes.
09:32:48	10	Q. Did you review anything other than the
	11	printout of the account notes?
	12	A. There was a policy.
	13	Q. Do you remember what the policy was?
	14	A. I think there was a it was called "SIM
09:33:12	15	Knowledge" "SIM Knowledge Center."
	16	Q. Okay. So other than Mr. Williams's account
	17	notes, the SIM knowledge center policy, did you
	18	review any other documents in preparation for today?
	19	A. There was two other policies around
09:33:37	20	authentication, one that was call center and one that
	21	was retail.
	22	Q. So a call center authentication policy and
	23	a retail center authentication policy?
	24	A. Yes.
09:34:01	25	Q. Anything else other than any other

	1	BY MR. LAVIGNE:
	2	Q. Had you seen Mr. Williams's account notes
	3	prior to preparing for your deposition today?
	4	A. Not that I recall.
09:39:13	5	Q. All right. Mr. Hill, I'm going to
	6	and well, one one other question.
	7	Were those account notes provided to you by
	8	AT&T?
	9	A. Yes.
09:39:28	10	Q. Were they provided to you by AT&T's
	11	attorneys, Ms. Okcu or Mr. Breslin?
	12	A. Yes.
	13	Q. I'll ask you a little bit about background
	14	briefly.
09:39:45	15	Starting with your education, would you
	16	tell me where you attended what college or
	17	university you attended.
	18	A. Wright State University and University of
	19	Phoenix.
09:40:05	20	Q. Rice State?
	21	A. W-R-I-G-H-T, Wright State.
	22	Q. And the University of Phoenix.
	23	And let's start with the first one, Wright
	24	State. When did you what were the dates of your
09:40:19	25	attendance?

	1	he did not authorize the SIM swap from the day
	2	before, that caller from November 6th.
	3	Q. All right. Do you know if anybody checked
	4	to determine whether the customer was telling the
14:31:23	5	truth that he didn't authorize the SIM swap the day
	6	before?
	7	A. Based on the account note that we're seeing
	8	here, we can see that the global fraud rep is saying
	9	that there's no usage on the SIM and so they
14:31:39	10	suspended the service and deemed it hijack crime.
	11	And that was their determination.
	12	Q. Do you have any information about the SIM
	13	swaps at issue in this case that come from anything
	14	other than these account notes?
14:32:16	15	A. No.
	16	Q. Who does?
	17	A. What do you mean?
	18	Q. Who who would have information about the
	19	SIM swaps at issue in this case that comes from
14:32:34	20	something other than these account notes?
	21	MR. BRESLIN: Form. Calls for speculation.
	22	You can answer, Ray.
	23	THE WITNESS: I'm I'm just kind of,
	24	like, misunderstanding, I think. Are you asking,
14:32:49	25	like, is there other data on a database? Or are you

	1	asking I'm just not understanding what what
	2	you're asking.
	3	BY MR. LAVIGNE:
	4	Q. I'm asking who who investigated this
4:32:59	5	these account hijacks or account takeovers or
	6	unauthorized SIM swaps on Mr. Williams's account?
	7	Because you just said that you didn't you don't
	8	know anything about it other than reading these
	9	notes.
4:33:14	10	A. I understand that.
	11	Q. Yeah.
	12	A. Yeah, so so the asset protection
	13	investigator, if if they wanted I don't recall
	14	which which case, which investigator, but
4:33:30	15	holistically, when we had that review between Niki
	16	and Rob Arno, they gave us a review
	17	MR. BRESLIN: Let's not let's not talk
	18	about what what was said there, but I think I
	19	think it's it's clear what he's getting at.
4:33:43	20	BY MR. LAVIGNE:
	21	Q. Yeah. So I think your answer is you
	22	don't correct me if I'm wrong, but what I'm
	23	hearing is you don't necessarily know but possibly
	24	Robert Arno?
4:33:56	25	A. Robert Arno or or another AP

	1	investigator.
	2	Q. Understood.
	3	These account notes refer to on
	4	November 6th at 11:25:29, they refer to case number
14:34:16	5	2018-11-06/4362.
	6	What does that refer to?
	7	A. That looks like an intake number. The
	8	the dash between the after the 06 I shouldn't
	9	say "dash." The backslash after the 06, I I
14:34:32	10	cannot tell if that's something from the global
	11	fraud's case management or if that's something that
	12	they referred for an intake with asset protection.
	13	So I don't know which of the two it is.
	14	Q. In your understanding, how how are
14:34:52	15	fraud well, just to back up even more elementary
	16	step.
	17	It appears, based on what you just said and
	18	based on these account notes, that the account notes
	19	we're reviewing on the screen right now, which are on
14:35:05	20	November 6, 2018, at 11:25:29, and 11:19:00, they're
	21	based on a phone call received from Jason Williams;
	22	is that right?
	23	A. Yes. That's a phone call from somebody
	24	saying they are Jason Williams.
14:35:25	25	Q. So if Jason Williams, a customer, calls in